

SUBPOENA DUCES TECUM (CIVIL) - COURT COPY
ATTORNEY ISSUED VA. CODE §§ 8.01-413, 16.1-89, 16.1-265;
Commonwealth of Virginia Supreme Court Rules 1:4, 4:9

Case No.: GV16000586-00

08/11/2016 at 9:30 am

HEARING DATE AND TIME

Bedford General District Court

Court

123 East Main Street, Suite 202, Bedford, VA 24523

COURT ADDRESS

Charlena Marie Blakey

v./In re:

Wesley Thomas Gillespie

TO THE PERSON AUTHORIZED BY LAW TO SERVE THIS PROCESS:

You are commanded to summon

Custodian of Records, Centra Health Inc. c/o Holly Trent, Esquire, Registered Agent

NAME

1901 Tate Springs Road

STREET ADDRESS

Lynchburg

Virginia

24501

CITY

STATE

ZIP

TO the person summoned: You are commanded to make available the documents and tangible things designated and described below:

See attachment "A".

at 7601 Timberlake Road, Lynchburg, VA 24502 at May 27, 2016 at 10 a.m.

LOCATION

DATE AND TIME

to permit such party or someone acting in his or her behalf to inspect and copy, test or sample such tangible things in your possession, custody or control.

This Subpoena Duces Tecum is issued by the attorney for and on behalf of

Charlena Marie Blakey

PARTY NAME

M. Paul Valois

NAME OF ATTORNEY

7601 Timberlake Road

OFFICE ADDRESS

Lynchburg, VA 24502

OFFICE ADDRESS

May 9, 2016

DATE ISSUED

72326

VIRGINIA STATE BAR NUMBER

434-845-4529

TELEPHONE NUMBER OF ATTORNEY

434-845-8536

FACSIMILE NUMBER OF ATTORNEY

Margaret C. Valois for M. Paul Valois

SIGNATURE OF ATTORNEY

Notice to Recipient: See page two for further information.

RETURN OF SERVICE (see page two of this form)

TO the person summoned:

If you are served with this subpoena less than 14 days prior to the date that compliance with this subpoena is required, you may object by notifying the party who issued the subpoena of your objection in writing and describing the basis of your objection in that writing.

☒ This SUBPOENA DUCES TECUM is being served by a private process server who must provide proof of service in accordance with Va. Code § 8.01-325.

TO the person authorized to serve this process: Upon execution, the return of this process shall be made to the clerk of court.

NAME:	
ADDRESS:	
<input type="checkbox"/> PERSONAL SERVICE	Tel. No.
Being unable to make personal service, a copy was delivered in the following manner:	
<input type="checkbox"/> Delivered to family member (not temporary sojourner or guest) age 16 or older at usual place of abode of party named above after giving information of its purport. List name, age of recipient, and relation of recipient to party named above:	
<input type="checkbox"/> Posted on front door or such other door as appear to be the main entrance of usual place of abode, address listed above. (Other authorized recipient not found.)	
<input type="checkbox"/> NOT FOUND, Sheriff
..... by Deputy Sheriff	
DATE	

CERTIFICATE OF COUNSEL

I, M. Paul Valois, counsel for Charlena Marie Blakey, hereby certify that a copy of the foregoing subpoena duces tecum was mailed DELIVERY METHOD to Wesley Thomas Gillespie, counsel of record for Defendant, on the 9th day of May, 2016.

Margarit C Valois for
SIGNATURE OF ATTORNEY

NOTICE: Upon receipt of the subpoenaed documents, the requesting party must, if requested, provide true and full copies of those documents to any other party or to the attorney for any other party, provided the other party or attorney for the other party pays the reasonable cost of copying or reproducing those documents. This does not apply when the subpoenaed documents are returnable to and maintained by the clerk of the court in which the action is pending. Va. Code § 8.01-417

ATTACHMENT "A"

**BEDFORD GENERAL DISTRICT COURT CASE NO. GV16000586-00
CHARLENA MARIE BLAKEY v. WESLEY THOMAS GILLESPIE
SUBPOENA DUCES TECUM TO CENTRA HEALTH, INC.**

ITEMS TO BE PRODUCED

1. Exact and true copies of each and every audio or video recording depicting Charlena Marie Blakey or Jonathan James Brewster Warner in the Psychiatric Emergency Center of Lynchburg General Hospital on January 11, 2016.
2. Exact and true copies of each and every document that mentions, refers, describes or relates to the shooting of Jonathan James Brewster Warner at the Psychiatric Emergency Center of Lynchburg General Hospital on January 11, 2016. Such documents include, but are not limited to, incident reports, electronic mail messages, memoranda, log entries, notes, graphs, photos, charts, drawings and letters. These requested documents do not include health care records as defined by Code of Virginia § 32.1-127.1:03.
3. Exact and true copies of each and every document that mentions, refers, describes or relates to the exercise of direction and discretion over the conduct of Special Conservators of the Peace employed by Centra Health, Inc. Such documents will include, but are not limited to, weapons policies, emergency preparedness policies, orders, directives, protocols and plans.
4. Exact and true copies of each and every document contained in the personnel file of Wesley Thomas Gillespie.
5. Exact and true copies of each and every job description of Wesley Thomas Gillespie during his employment by Centra Health, Inc.
6. Exact and true copies of each and every report of misconduct or malfeasance by Wesley Thomas Gillespie made by any person at any time during his employment by Centra Health, Inc.
7. Exact and true copies of each and every document that mentions, refers, describes or relates to proposed or accomplished establishment, discontinuation or modification of any security policies, procedures or protocols of Centra Health Inc. that occurred on or after January 11, 2016.
8. The operating manual for the TASER that Wesley Thomas Gillespie carried in the Psychiatric Emergency Center at Lynchburg General Hospital on January 11, 2016.

CERTIFICATE PURSUANT TO VIRGINIA CODE SECTION 8.01-391-B

This is to certify that I am the legal custodian of the foregoing record and further that this is a true and authentic copy of the original record.

Clerk

Deputy Clerk